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**ISRA 009, Area II**  
**AP/STP-1C-1 (Non-Hazardous, Radionuclides > LUT)**  
**Soil Sampling for Radionuclides**  
**and Waste Certification**

**Introduction**

This data package provides the laboratory results of two samples taken at the AP/STP-1C-1 (Non Hazardous, Radionuclides>LUT) site in Area II. The location of the two soil samples and the demarcated area (designated by the pink shaded area) are shown in Appendix 1. Soil sample results are compared to the draft provisional DTSC look-up table (LUT) values in order to determine if soil exceeds background as required for the NASA/DTSC Administrative Order on Consent (AOC)<sup>1</sup>.

**Methodology**

Numerous samples have been taken in the AP/STP-1C-1 area for waste characterization. The majority of samples exhibited no elevated concentrations of radionuclides above background. The minority of samples discussed here exhibited elevated concentrations of radionuclides above background.

Samples discussed here apply to the non-hazardous, radionuclides>LUT waste stream. Samples taken in 2011 for waste disposal characterization were analyzed for uranium-238 using gamma spectroscopy. These were a step-out sample (10/18/2011) for a neighboring unverified U-238 exceedance and a re-sample (11/16/2011) taken at the same location.

NASA and DTSC have signed an AOC that requires soils on Area II and portions of Area I to be cleaned up to background<sup>2</sup>. The USEPA has characterized local radionuclide background<sup>3</sup> in soil and has published preliminary radiological trigger levels (RTL) based on the higher of background threshold values (BTV) or minimum detectable concentrations (MDC)<sup>4</sup>.

On August 23, 2012, DTSC sent NASA a letter regarding excavation of ISRA soil<sup>5</sup>. In the letter, DTSC stated,

*“DTSC agrees with using the December 2011 USEPA RTLs for all radionuclides as the values for disposal of the ISRA soils. DTSC has concluded that use of the RTLs will not be inconsistent with SSFL radiological Lookup Table values.”*

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<sup>1</sup> “Administrative Order on Consent for Remedial Action (AOC)”, December 6, 2010, signed by the National Aeronautics and Space Administration (NASA) and the Department of Toxic Substances Control (DTSC).

<sup>2</sup> Page 5, Section 2.1 of the AOC states, “The cleanup of soils at the Site [Area II and portions of Area I] shall result in the end state of the Site after cleanup to be consistent with “background.” That is, at the completion of the cleanup, no contaminants shall remain in the soil above local background levels, with the exception of the exercise of the exemptions that are specifically expressed in the AIP. All response actions taken pursuant to this Order shall be performed so as to accomplish this objective, in full compliance with the terms and conditions detailed in the AIP, and in accordance with workplans that have been submitted to and approved by DTSC. Similarly, to the extent any radiological materials are determined to be present at this portion of the Site, the cleanup of soils at the Site contaminated with radiological materials shall result in no radiological contaminants remaining in the soil above local background levels, with the exception of the exercise of the same exemptions expressed in the AIP.”

<sup>3</sup> USEPA, “Final Radiological Background Study Report, Santa Susana Field Laboratory, Ventura County, California”, October 2011.

<sup>4</sup> USEPA, “Technical Memorandum, Radiological Trigger Levels, Santa Susana Field Laboratory Site, Area IV Radiological Study”, December 12, 2011.

<sup>5</sup> DTSC, “Management and Disposal of Radionuclide-impacted Soil Excavated for Interim Source Removal Actions on NASA Property, Santa Susana Field Laboratory, Ventura County, California”, August 23, 2012

*"ISRA radiological soil sample results that exceed the RTLs and that have not been re-sampled may be re-sampled to evaluate the initial RTL exceedance. Soil at locations characterized by initial and re-sample radiological results exceeding their respective RTLs will be removed and disposed of at a LLRW disposal facility, per Section 2.10 of the AOC."*

*"Validated radiological sample concentrations below the sample MDC can be treated as "non-detects" and the associated soil is not subject to the Section 2.10, AOC soil disposal conditions."*

USEPA issued revised RTLs<sup>6</sup> in December 2012 which were, in general, higher than the original RTLs. USEPA also issued laboratory specific radiological reference concentrations (RRC) in December 2012<sup>7</sup>. Subsequently, DTSC issued draft provisional LUTs<sup>8</sup> for 16 radionuclides in January 2013, which in general matched the revised RTLs for those radionuclides whose RTLs were derived from BTVs<sup>9</sup> (for example cesium-137 and uranium-238). The draft provisional LUTs subset also matched exactly the lower of the two lab-specific RRCs. Consistent with DTSC's intent in issuing draft provisional LUTs for interim remedial action implementation, ELV-1C data is compared to draft provisional LUTs and sample MDCs to determine compliance with the DTSC/NASA AOC.

## Results

Appendix 2 shows the soil radionuclide data for the samples taken at the AP/STP-1C-1 non-hazardous area compared to the draft provisional LUTs and sample MDCs. LUT exceedances are highlighted in yellow

Both samples (2.35 and 2.06 pCi/g) exceed the uranium-238 LUT of 1.96 pCi/g.

Therefore, according to the NASA/DTSC AOC this waste is classified as contaminated above background.

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<sup>6</sup> USEPA, "Attachment A – Original and Corrected Radiological Trigger Levels - Development and Use of Radiological Reference Concentrations", Appendix K of "Final Radiological Characterization of Soils - Area IV and Northern Buffer Zone", December 21, 2012.

<sup>7</sup> USEPA, "Attachment B - Radiological Reference Concentrations - Development and Use of Radiological Reference Concentrations", Appendix K of "Final Radiological Characterization of Soils - Area IV and Northern Buffer Zone", December 21, 2012.

<sup>8</sup> DTSC, "Development of the Draft Provisional Radiological Look-Up Table", DTSC Public Meeting, Chatsworth, California, January 30, 2013.

<sup>9</sup> A notable exception was strontium-90 with a BTV of 0.075 pCi/g, an original RTL of 0.485 pCi/g, a revised RTL of 0.645 pCi/g, lab specific RRCs of 1.07 and 0.117 pCi/g and a draft provisional LUT of 0.117 pCi/g.

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## Conclusions

In compliance with the NASA/DTSC AOC, excavated soil from the AP/STP-1C-1 (non-hazardous, radionuclides>LUT) area will be disposed of at EnergySolutions, Clive, Utah, a licensed low-level radioactive waste site.



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**Appendix 1**  
**ELV-1C Sampling Locations**

# Outfall 009 Waste Characterization Sample Locations for AP/STP-1C-1

- Base Map Legend**
- Administrative Area
  - Boundary
  - RFI Site Boundary
  - Report Group Boundary
  - NPDES Outfall
  - A/C Paving
  - Drainage
  - Non Jurisdictional Surface Water Pathway
  - Surface Water Divide

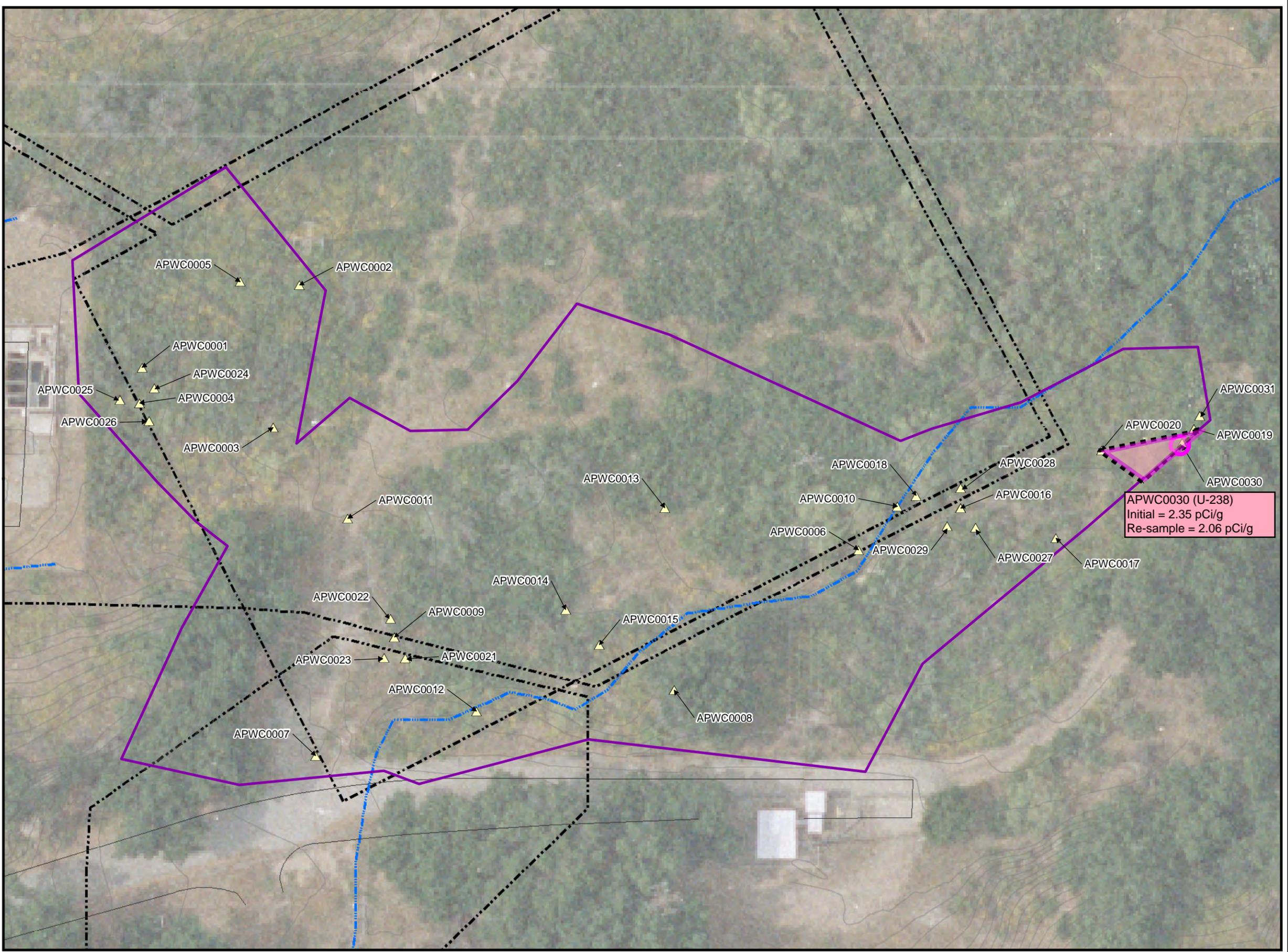
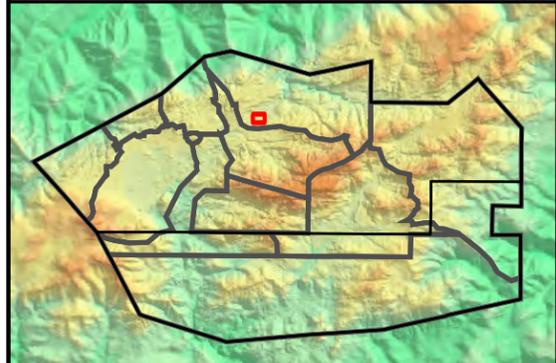
- Base Map Legend**
- ISRA Excavation Boundary
  - Waste Characterization Sample Location

- January 2013 LUT Value**  
U-238 = 1.96 pCi/g
- Sample with confirmed result above LUT value.
  - Boundary of soils with results above LUT value
  - Boundary of non-hazardous soil with radionuclides above LUT value.

**Note:**

- Sample locations and depths were randomly selected. The 3ft x 3ft grid used in the sample location selection process is shown.
- Aerial imagery from Google Earth, 2010.
- Topographic contours from Lidar data, 2008.

Path: T:\projects\rock3\ISRA\Figures\NASA\AP-STP-1C-1\WC.mxd Date: 12/12/2011



APWC0030 (U-238)  
Initial = 2.35 pCi/g  
Re-sample = 2.06 pCi/g



SANTA SUSANA FIELD LABORATORY

FIGURE 1

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**Appendix 2**

**ELV-1C (Non-Hazardous, Radionuclides>LUT)  
Radionuclide Results**

AP-STP-1C-1 NASA ISRA - NON HAZARDOUS - RADIOLOGICAL > LUT

Sampling Date	Sampling Location (General)	Sampling Location (Specific)	Sample Serial Number	Media Type	Isotope	Activity	Error (+/-)	MDC	DTSC LUT	LUT Source	Activity > LUT ?	Activity > MDC ?	Detected Activity	Detected Activity > LUT ?	Non-detect Activity	Non-detect Activity > LUT ?	MDC > LUT ?	Ratio of MDC to LUT	Units	Error Type	Comments	Document
10/18/2011	AP/STP-1C-1	APWC0030	APWC0030S001	Soil	Uranium-238	2.35	1.05	0.92	1.96	BTV	YES	YES	2.35	YES	-	-	-	0.47	pCi/g	2 sigma	APWC0019 Stepout #1; Re-sampled	288414
11/16/2011	AP/STP-1C-1	APWC0030	APWC0030AS001	Soil	Uranium-238	2.06	0.771	0.474	1.96	BTV	YES	YES	2.06	YES	-	-	-	0.24	pCi/g	2 sigma	Re-sample	290463